

## REMARKS

Claims 1-13, 22-23, and 28-40 are pending in the present application. Claims 14-21 and 24-27 were previously canceled. No new matter has been added. Applicants respectfully request reconsideration of the claims in view of the following remarks.

Claims 1, 4-6, 22, 23, 28, 29, and 40 have been rejected under 35 U.S.C. § 102(b) as being anticipated by Chen (U.S. Publication No. 2002/0170880, hereinafter “Chen”) in view of Sangu et al. (U.S. Publication No. 2001/0026638, hereinafter “Sangu”); and claims 2, 3, 7-13 and 30-39 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Chen in view of Sangu as applied to claims 1, 4-6, 22, 23, 28, 29, and 40 above, and further in view of Farrar et al. (U.S. Publication No. 2002/0076896, hereinafter “Farrar”). Applicants respectfully traverse these rejections.

Claim 1, as previously presented, recites “a positioning system comprising a plurality of infrared light sources and a plurality of infrared cameras, wherein each mutually assigned pair of alignment marks is assigned an infrared light source and a corresponding infrared camera.” Chen and Sangu do not teach or suggest “a plurality of infrared cameras, wherein each mutually assigned pair of alignment marks is assigned an infrared light source and a corresponding infrared camera.” According to the Office Action, “Chen does not clearly teach the plurality of infrared light sources and a plurality of infrared cameras. Sangu et al. teaches the plurality of X-ray sources or infrared light sources 1 and a plurality of CCD cameras or infrared cameras 2.” To the contrary, Sangu teaches an alignment system where “the alignment mark on the core board is invisible because the layer is covered by copper foil before the pattern is formed.” Sangu, paragraph [0005]. Sangu therefore teaches using an X-ray source to penetrate the circuit boards and using a fluorescent screen to convert X-rays to a visible or infrared light *after* the X-rays pass

through the surfaces to be aligned. Sangu, paragraphs [0008] to [0010]. Nowhere does Sangu teach or suggest that an infrared light source is used. Furthermore, it would be impossible for Sangu to teach or suggest an infrared light source because an infrared light source would not be able to penetrate the layer covered by the copper foil.

To establish a prima facie case of obviousness, three basic criteria must be met. See M.P.E.P. § 2143. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art references when combined must teach or suggest all the claim limitations. Without even considering the first and second criteria, Applicants respectfully assert that because Chen and Sangu do not teach or suggest “a plurality of infrared light sources,” the prior art references when combined do not teach or suggest all the claim limitations. Applicants, therefore, respectfully submit that claim 1 is allowable over the prior art of record.

Claims 2-13 and 32-39 depend from claim 1 directly or indirectly and add further limitations. It is respectfully submitted that these dependent claims are allowable by reason of depending from an allowable claim as well as for adding new limitations.

Claim 22, as previously presented, recites that “the infrared position system includes a plurality of infrared light sources and a plurality of infrared cameras, wherein each alignment mark on the stamp is aligned with a corresponding alignment mark on the semiconductor wafer using one of the infrared light sources and one of the infrared cameras.” As discussed with respect to claim 1, hereinabove, Chen and Sangu do not teach or suggest “a plurality of infrared light sources.” Applicants, therefore, respectfully submit that claim 22 is allowable over the prior art of record.

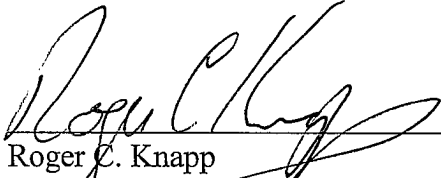
Claims 23, 28-31, and 40 depend from claim 22 directly or indirectly and add further limitations. It is respectfully submitted that these dependent claims are allowable by reason of depending from an allowable claim as well as for adding new limitations.

Applicants have made a diligent effort to place the claims in condition for allowance. However, should there remain unresolved issues that require adverse action, it is respectfully requested that the Examiner telephone, Applicants' attorney, at 972-732-1001 so that such issues may be resolved as expeditiously as possible. No fee is believed due in connection with this filing. However, should one be deemed due, the Commissioner is hereby authorized to charge, or credit any overpayment, Deposit Account No. 50-1065.

Respectfully submitted,

9-19-07  
Date

SLATER & MATSIL, L.L.P.  
17950 Preston Rd., Suite 1000  
Dallas, Texas 75252  
Tel.: 972-732-1001  
Fax: 972-732-9218

  
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Roger C. Knapp  
Attorney for Applicants  
Reg. No. 46,836